

1 GIBSON, DUNN & CRUTCHER LLP  
2 HEATHER L. RICHARDSON, SBN 246517  
3 HRichardson@gibsondunn.com  
4 LAUREN M. BLAS, SBN 296823  
5 LBlas@gibsondunn.com  
6 ANGELA REID, SBN 323057  
7 AReid@gibsondunn.com  
8 333 South Grand Avenue  
9 Los Angeles, California 90071  
10 Telephone: 213.229.7000  
Facsimile: 213.229.7520

7 GIBSON, DUNN & CRUTCHER LLP  
JENNAFER M. TRYCK, SBN 291088  
8 JTryck@gibsondunn.com  
3161 Michelson Drive  
9 Irvine, California 92612-4412  
Telephone: 949.451.3800  
10 Facsimile: 949.451.4220

11 *Attorneys for Defendants*  
12 *United Healthcare Services, Inc., and*  
*UnitedHealth Group Incorporated*

13  
14 IN THE UNITED STATES DISTRICT COURT  
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
16 SAN JOSE DIVISION

17 Reyna Dempsey, individually, on behalf of  
18 others similarly situated, and on behalf of the  
general public,

19 Plaintiff,

20 v.

21 Government Employees Insurance Company,  
22 United Healthcare Services, Inc., UnitedHealth  
Group Incorporated, and DOES 1 through 10,  
inclusive,

23 Defendants.

24 Case No. 5:24-cv-00425-EJD

25 ASSIGNED TO THE HON. EDWARD J.  
DAVILA

26 **JOINT STIPULATION TO EXTEND  
TIME TO RESPOND TO COMPLAINT  
[LOCAL RULE 6-1]**

1 Plaintiff Reyna Dempsey, individually, on behalf of others similarly situated, and on behalf of  
2 the general public (“Plaintiff”) and Defendants United Healthcare Services, Inc. (“UHC”) and  
3 UnitedHealth Group Incorporated (“UHG”) (together, the “United Defendants”), by and through their  
4 respective counsel, hereby agree and stipulate as follows:

5 WHEREAS, Plaintiff filed the Complaint in this Court on January 24, 2024;

6 WHEREAS, on February 2, 2024, Plaintiff served Defendant UHC with the Complaint;

7 WHEREAS, on February 14, 2024, Defendant UHG accepted service of the Complaint via  
8 email;

9 WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Defendant UHC’s deadline to file  
10 a responsive pleading to Plaintiff’s Complaint is February 23, 2024;

11 WHEREAS, pursuant to Federal Rule of Civil Procedure 12, Defendant UHG’s deadline to  
12 file a responsive pleading to Plaintiff’s Complaint is March 6, 2024;

13 WHEREAS, the United Defendants are represented by the same counsel;

14 WHEREAS, counsel for Plaintiff and the United Defendants have conferred, and the parties  
15 agree that the deadline for the United Defendants to answer or otherwise respond to the Complaint be  
16 extended to March 25, 2024;

17 WHEREAS, the parties will benefit from this extension of time, as it will enable the parties to  
18 investigate and meet and confer regarding Plaintiff’s allegations;

19 WHEREAS, this extension of time will not affect any other deadlines on the Court’s calendar;

20 NOW, THEREFORE, pursuant to Local Rule 6-1 of the Northern District of California, it is  
21 hereby stipulated and agreed, that the United Defendants shall have until March 25, 2024 to file their  
22 response to Plaintiff’s Complaint.

23 **IT IS SO STIPULATED.**

1 DATED: February 22, 2024

Respectfully submitted,

2  
3  
4 GIBSON, DUNN & CRUTCHER LLP

5  
6 By: /s/ Heather L. Richardson  
7 Heather L. Richardson

8  
9  
10 Attorneys for Defendants  
11 United Healthcare Services, Inc. and  
12 UnitedHealth Group Incorporated

13 DATED: February 22, 2024

14 NICHOLS KASTER, LLP

15  
16 By: /s/ Matthew Helland  
17 Matthew Helland

18  
19 Attorneys for Plaintiff Reyna Dempsey

## **ATTORNEY ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, Heather Richardson, hereby attest that concurrence in the filing of this document has been obtained from Plaintiff's counsel Matthew Helland.

DATED: February 22, 2024

Respectfully submitted,

## GIBSON, DUNN & CRUTCHER LLP

By: /s/ Heather L. Richardson  
Heather L. Richardson

Attorneys for Defendants  
United Healthcare Services, Inc. and  
UnitedHealth Group Incorporated